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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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OFFICE OF THE SECRETARY

Revision of the Commission's Rules)
To Enhance Compatibility with) CC Docket No. 94-102
Enhanced 911 Emergency)
Calling Systems)

E-911 INTERIM REPORT

I. E-911 Interim Report

MP Communications Partners, L.P. ("MP"), hereby provides an interim E-911 implementation report pursuant to the Commission's June 26, 2002 Order in the above-captioned proceeding¹ and the FCC's Public Notice dated June 6, 2003.²

II. History

MP obtained a wireline cellular license for unserved areas within the Albuquerque, NM MSA in 1995. MP entered into a management agreement with U S WEST NewVector Group, Inc. (now Verizon Wireless) to construct and operate MP's cellular system under MP's oversight, supervision, and control. MP's system became operational in May, 1996. MP's system currently provides analog and CDMA digital cellular service, and its calls are switched by Verizon's switch, located in Albuquerque. Under the definitions adopted in the Order, since MP does not have 500,000 or more subscribers, it is a Tier III carrier.

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, CC Docket No. 94-102, FCC 02-210 (released July 26, 2002) ("Order").

² FCC Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902, released June 6, 2003.

MP had initially reported to the Commission that it intended to employ a network solution to meet the requirements of Section 20.18(g) of the Commission's rules.³ MP has also previously reported that after extensive testing, MP's manager, Verizon, had determined that no network solution could meet the deadlines in the Commission's rules. Verizon has determined that it will implement a network Assisted Global Positioning System/Advanced Forward Link Trilateration ("AGPS/AFLT") handset solution. The Commission granted Verizon a limited waiver of the schedule set forth in Section 20.18(g) in order to implement a handset solution that meets the requirements of the rules.

MP notified the Commission that it also intends to implement the AGPS/AFLT solution, and had requested that the Commission grant MP the same limited relief regarding the schedule for implementation of Phase II E-911 service. MP also reported to the Commission that it had upgraded its two (2) cell sites in order to provide digital service in its service area. MP's calls are switched by Verizon's Lucent equipment deployed to serve the Albuquerque, NM area, which had been upgraded to accommodate E-911 requirements.

III. Interim Report

In response to the FCC's Order, MP supplies the following information:

Number of Phase I and Phase II requests from Public Safety Answering Points ("PSAPs"). MP has not received any requests for Phase I or Phase II E-911 service from PSAPs. Verizon, which manages MP's system in Albuquerque, NM, has told MP that the state of New Mexico has placed responsibility for E-911 mobile service deployment with the New Mexico State Department of Finance and Administration ("NMSDFA"). MP has been informed by Verizon that it has received one valid request from NMSDFA for Phase I

³ See MP Communications Report, dated January 10, 2001.

service for the city of Albuquerque and Bernalillo County, which includes three PSAPs.

Verizon is currently working with the state of New Mexico and the PSAPS to implement Phase I E-911 service within the six month time period as required by the FCC's rules.

MP's cellular system currently consists of two cell sites. The "Volcano" cell site's traffic is routed to Bernalillo County and is subject to the Phase I E-911 request. Verizon has committed to MP that the Volcano cell site will be included in Verizon's Phase I E-911 deployment. MP's other cell site's traffic is directed to another county and is not subject to the Phase I E-911 request.

Carrier's specific technology choice. For Phase I E-911 service, MP is implementing a Wireline Compatibility Mode (commonly referred to NCAS) solution. This solution will be the platform for Phase II E-911 service, which, as previously reported, will be a network Assisted Global Positioning System/Advanced Forward Link Trilateration ("AGPS/AFLT") solution.

Ordering and Installing Network Equipment. MP's manager, Verizon, represents to MP that no ordering, installation, or upgrades to the existing cellular network are required in order to implement Phase I or Phase II E-911 service in New Mexico. Rather, the location of MP's Volcano cell site will be added to the database that will be part of the system that will transmit cell site data to PSAPs during Phase I of E-911 service. MP's other site will be added to the cell site data when Phase I service is implemented in Sandoval County, New Mexico.

Handset Availability. MP operates a small unserved area within the Albuquerque, NM MSA. The area served is sparsely populated and currently cannot economically support even a single retail sales outlet. Consequently, MP is not selling any handsets. However, Verizon Wireless, its manager, represents that it currently markets at least ten (10) different handsets

that are Automatic Location Identification (“ALI”)-capable in its retail stores, including the Albuquerque, NM MSA.

Estimated Date On Which Phase II Service Will Be Available. MP’s manager, Verizon, is working with the state of New Mexico to implement E-911 service in accordance with the state’s requirements. Consequently, Verizon does not plan to implement Phase II service until the state indicates that such it is ready to utilize that service. Verizon maintains that its network, which includes both of MP’s cell sites, is currently capable of providing Phase II service.

Compliance with Ultimate Implementation Date. As a very small cellular carrier, MP would not be capable of implementing E-911 service on its own. MP has partnered its manager, Verizon, one of the largest national wireless carriers, in order to ensure that it meets its E-911 regulatory obligations. Since MP has chosen a handset solution, no network upgrades are needed in order to implement E-911 service. Verizon has begun to market handsets that will meet the Commission’s handset penetration requirements. Regarding the Commission’s ultimate implementation date of December 31, 2005, Verizon’s position is that the date is not relevant for Phase II deployment since Phase II deployment will be determined by PSAPs’ requests for service.

Please contact the undersigned if you have questions or need further information.

Respectfully submitted,

**MP COMMUNICATIONS
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